
From: [Jennifer Allim](#)
To: [Carlisle, Marie L.](#)
Cc: [Helen Chaitman](#)
Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079
Date: Friday, July 29, 2016 4:18:34 PM
Attachments: [Depositions to be Scheduled \(002\).docx](#)

Hi Marie:

Please see the attached for the proposed dates that I was able to obtain so far. As indicated in the attachment, I am working on coordinating with the remaining clients for whom you have requested dates.

Jennifer Allim
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From: Carlisle, Marie L. [mailto:mcarlisle@bakerlaw.com]
Sent: Friday, July 29, 2016 4:08 PM
To: Jennifer Allim <jallim@chaitmanllp.com>
Cc: Helen Chaitman <hchaitman@chaitmanllp.com>; Smith, Rachel M. <rsmith@bakerlaw.com>; Hunt, Dean D. <dhunt@bakerlaw.com>
Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Jennifer,

As I mentioned the other day, I will be out of the office beginning on Monday, with limited availability after Monday evening. Fact discovery will be closing in the next few weeks in the following adversary proceedings for which I've asked you to supplement discovery and provide deposition dates.

APN 10-04728	DiGiulian	08/11/16
APN 10-04748	Horowitz	08/12/16
APN 10-04541	Kenneth Perlman	08/15/16
APN 10-04768	Placon2	08/15/16

I am relying on your representation below that you are working on obtaining new deposition dates for these and other cases and that you will have them to me by Monday. If we have the new deposition dates by Monday, I can have my office turn around new case management plans next week for approval and filing. If you are unable to get the dates to me by Monday, and can assure me that you will provide new dates by the time I return on August 10th, then we will agree to informally extend fact discovery deadlines in these cases and, upon my return, can assess the status of

discovery and amend case management plans to accommodate your clients' new deposition dates.

Please let me know if you are in agreement with this approach. I am available this afternoon if you would prefer to discuss.

Thanks,

Marie

From: Jennifer Allim [<mailto:jallim@chaitmanllp.com>]
Sent: Thursday, July 28, 2016 5:36 PM
To: Carlisle, Marie L.
Cc: Helen Chaitman
Subject: FW: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Hi Marie:

Amended responses for Adv. Pro. No. 10-05079, Picard v. Goodman have been submitted.

I am working on obtaining client availability for depositions and should get them to you by Monday, as discussed.

Best,

Jennifer

Jennifer Allim
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From: Sarah Howell
Sent: Thursday, July 28, 2016 6:30 PM
To: dsheehan@bakerlaw.com; ncremona@bakerlaw.com; mcarlisle@bakerlaw.com; dhunt@bakerlaw.com
Cc: Helen Chaitman <hchaitman@chaitmanllp.com>; Jennifer Allim <jallim@chaitmanllp.com>
Subject: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

NAME OF COURT:	U.S. Bankruptcy Court Southern District of New York
CASE NO(S):	10-05079
PLAINTIFF(S)	Irving H. Picard

DEFENDANT(S):	ESTATE OF JAMES M. GOODMAN; and AUDREY GOODMAN, individually, and in her capacity as Personal Representative of the Estate of James M. Goodman
DOCUMENT BEING SERVED:	<ul style="list-style-type: none">- Amended Responses and Objections of Audrey Goodman to Trustee's First Request for Production of Documents;- Amended Responses and Objections of Audrey Goodman to Trustee's First Set of Interrogatories with Verificaiton;- Amended Responses and Objections of Audrey Goodman as Personal Representaitive of the Estate of James M. Goodman to Trustee's First Set of Interrogatories with Verificaiton; and- Amended Responses and Objections of Audrey Goodman as Personal Representaitive of the Estate of James M. Goodman to Trustee's First Request for Produciton of Documents
SENDER'S NAME:	Helen Davis Chaitman, Esq. / Sarah Howell
SENDER'S TELEPHONE NO.:	888-759-1114

Sarah Howell, Paralegal
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ATTACHMENT 1

Depositions to be Scheduled

Notices Sent:

Current Fact Discovery Deadline

APN 10-04768- Picard v. Placon 2 Mr. Cohen is available to be deposed during the second week of October on 10/11 – 10/13 . He has suggested the use of his conference room located at 35 Hillside Avenue, Hillside NJ, 07025 .	August 15, 2016
APN 10-04428- Picard v. Meisels Mr. Meisels is available to be deposed during the last week in September on 9/27 in Short Hills NJ at the Hilton as previously scheduled.	August 22, 2016
APN 10-05079- Picard v. James Goodman Mr. Goodman is available to be deposed during the third week of October on 10/18 in New York City at Baker and Hostetler .	August 29, 2016
APN 10-04614- Picard v. Whitman Mr. Whitman is available to be deposed during the first week in October on 10/4 - 10/6 in Jacksonville, Florida .	October 15, 2016 (as agreed)
We are working on obtaining availability for the following matters	
APN 10-04748- Picard v. Mark Horowitz	August 12, 2016
APN 10-04728- Picard v. DiGiulian	August 11, 2016
APN 10-04541- Picard v. Perlman	August 15, 2016
APN 10-04818- Picard v. Harwood	August 18, 2016
APN 10-04914- Picard v. Gordon	August 29, 2016
APN 10-04826- Boyer Palmer	September 1, 2016
APN 10-04644- Russell Dusek	September 6, 2016